EXHIBIT AA

Release Number 8838-23

CFTC Approves Two Proposals and a DCO Application

December 18, 2023

Washington, D.C. — The Commodity Futures Trading Commission at its open meeting on December 13 approved the following proposed rules and a DCO application. Additional information on these rulemakings, including statements of the Chairman and the Commissioners, is available here (https://www.cftc.gov/PressRoom/Events/opaeventopenmeeting121323).

Notice of Proposed Rulemaking: Operational Resilience Framework for Futures Commission Merchants, Swap Dealers, and Major Swap Participants (https://www.cftc.gov/media/9951/votingdraft121323_OperationalResilienceNPRM/download)

The Commission unanimously approved a rule proposal requiring that futures commission merchants, swap dealers, and major swap participants establish, document, implement, and maintain an Operational Resilience Framework reasonably designed to identify, monitor, manage, and assess risks relating to information and technology security, third-party relationships, and emergencies or other significant disruptions to normal business operations. The framework would include three components – an information and technology security program, a third-party relationship program, and a business continuity and disaster recovery plan – supported by broad requirements relating to governance, training, testing, and recordkeeping. The proposed rule would also require certain notifications to the Commission and customers or counterparties. The Commission is further proposing guidance relating to the management of risks stemming from third-party relationships. [See Fact Sheet (https://www.cftc.gov/media/9986/ORFNPRMFactSheetandQA_121823/download)]

The comment period will be open for 75 days after publication on CFTC.gov (http://www.cftc.gov), with a closing date of March 2, 2024.

Notice of Proposed Rulemaking: Protection of Clearing Member Funds Held by Derivatives Clearing Organizations (https://www.cftc.gov/sites/default/files/2024/01/2023-28767a.pdf)

The Commission approved a rule proposing regulations to provide protections for clearing member funds and assets held by a Derivatives Clearing Organization (DCO). The rule would require, among other things, that clearing member funds be segregated from the DCO's own funds and held in a depository that acknowledges, in writing, that the funds belong to clearing members, not the DCO. In addition, the Commission is proposing rules that would enable DCOs to hold customer and clearing member funds at certain foreign central banks subject to certain requirements. The Commission is also proposing to require DCOs to conduct a daily calculation and reconciliation of the amount of funds owed to customers and clearing members and the amount actually held for customers and clearing members. [See Fact Sheet (https://www.cftc.gov/media/9881/NPRMPart39FactSheet_121323/download)]

The comment period will be open for 60 days after publication on CFTC.gov (http://www.cftc.gov), with a closing date of February 16, 2024.

Application of Bitnomial Clearinghouse, LLC for Registration as a Derivatives Clearing Organization (https://www.cftc.gov/media/9931/BitnomialDCOregOrder121523/download)

The Commission approved an order granting Bitnomial Clearinghouse, LLC (Bitnomial) registration as a DCO under Section 5b of the Commodity Exchange Act. Subject to the terms and conditions of the order, Bitnomial is authorized to provide clearing services for futures and options on futures traded on a designated contract market (DCM). Bitnomial's parent company, Bitnomial Exchange, LLC, is registered with the CFTC as a DCM. For information about DCOs, see Clearing Organizations (https://www.cftc.gov/IndustryOversight/ClearingOrganizations/index.htm).

All comments for proposed rules must be in writing and may be submitted electronically through the CFTC Comments online (https://comments.cftc.gov/PublicComments/ReleasesWithComments.aspx) *process. All comments received will be posted on CFTC.gov* (https://www.cftc.gov/).

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